

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ST. VINCENT CATHOLIC
CHARITIES,

Plaintiff,

v.

INGHAM COUNTY BOARD OF
COMMISSIONERS,

Defendant.

CASE NO. 1:19-CV-1050

HON. ROBERT J. JONKER

**STIPULATION TO EXTEND
PLAINTIFF'S DEADLINE TO
SEEK ATTORNEY'S FEES
AND COSTS**

Bonnie G. Toskey (P30601)
Sarah Kay Osburn (P55539)
Cohl Stoker & Toskey, P.C.
601 N. Capitol Ave.
Lansing, MI 48933
(517) 372-9000
btoskey@cstmlaw.com

Counsel for Defendant

William J. Haun
Mark L. Rienzi
Lori H. Windham
Nicholas R. Reaves
The Becket Fund for Religious Liberty
1919 Pennsylvania Ave NW, Suite 400
Washington, DC 20006
(202) 955-0095
lwindham@becketlaw.org

William R. Bloomfield (P68515)
Catholic Diocese of Lansing
Lansing, Michigan 48933-1122
(517) 342-2522
wbloomfield@dioceseoflansing.org

Counsel for Plaintiff

STIPULATION TO EXTEND PLAINTIFF'S DEADLINE TO SEEK ATTORNEY'S FEES AND COSTS

The parties, by and through undersigned counsel, stipulate to extend the deadline for Plaintiff to seek attorney's fees and costs under Fed. R. Civ. P. 54 and 42 U.S.C. § 1988. The parties are still discussing the possibility of resolving fees without litigation. Accordingly, the parties agree that Plaintiff shall file its motion for attorney's fees and costs on or before October 16, 2023.

WHEREFORE, the parties respectfully request that this Honorable Court enter the attached proposed stipulated order to extend the deadline for Plaintiff to seek attorney's fees and costs.

IT IS SO STIPULATED.

Dated: September 26, 2023

/s/ William J. Haun

William J. Haun

Mark L. Rienzi

Lori H. Windam

Nicholas R. Reaves

The Becket Fund for Religious Liberty

1919 Pennsylvania Ave NW, Suite 400

Washington, DC 20006

Telephone: (202) 955-0095

Facsimile: (202) 955-0090

lwindham@becketlaw.org

William R. Bloomfield (P68515)

Catholic Diocese of Lansing

Lansing, Michigan 48933-1122

(517) 342-2522
wbloomfield@dioceseoflansing.org

Counsel for Plaintiff

Dated: September 26, 2023

/s/ Bonnie G. Toskey
Bonnie G. Toskey
Cohl Stoker & Toskey, P.C.
601 N. Capitol Ave.
Lansing, MI 48933
(517) 372-9000
btoskey@cstmlaw.com

**ORDER GRANTING STIPULATION TO EXTEND DEADLINE TO
SEEK ATTORNEY'S FEES AND COSTS**

This matter having come before the Court upon the parties'
Stipulation to extend the deadline for Plaintiff to seek attorney's fees
and costs under Fed. R. Civ. P. 54 and 42 U.S.C. § 1988.

IT IS HEREBY ORDERED that Plaintiff's motion for attorney's fees
and costs shall be due on or before October 16, 2023.

IT IS SO ORDERED.

Dated: September 27, 2023

/s/ Robert J. Jonker
HON. ROBERT J. JONKER
United States District Court Judge